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Federal Defender  
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Assistant Federal Defender  
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6 Attorneys for Defendant  
Mr. Wilson  
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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) Case No. 2:21-cr-00155-JAM-1  
11 )  
Plaintiff, ) **STIPULATION AND ORDER TO CONTINUE**  
12 ) **STATUS CONFERENCE AND EXCLUDE TIME**  
vs. )  
13 ) Date: February 13, 2024  
JOSHUA WILSON and ) Time: 9:00 a.m.  
14 CODY CRAMER, ) Judge: Hon. John A. Mendez  
15 Defendants. )

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17 IT IS HEREBY STIPULATED and agreed by and between United States Attorney  
18 Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for  
19 Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan  
20 Baigmohammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody  
21 Cramer that the status hearing currently set for February 13, 2024 at 9:00 be continued to April  
22 23, 2024 at 9:00 a.m.

23 The parties specifically stipulate as follows:

- 24 1. By previous order, this matter was set for a status on February 13, 2024 at 9:00  
a.m.  
25 2. By stipulation, Mr. Wilson now moves to continue the status conference to **April**  
26 **23, 2024, at 9:00 a.m.**  
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3. To date, the government has produced approximately 850 pages and various audio/video recordings of discovery to the defendants.
4. Mr. Wilson and Mr. Cramer require additional time to review the discovery, investigate and research possible defenses, research potential pretrial motions, and explore potential resolutions to the case, and otherwise prepare for trial.
5. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
6. Neither the government nor Mr. Cramer object to the continuance.
7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between February 13, 2024 and April 23, 2024, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public, Mr. Wilson, and Mr. Cramer in a speedy trial.

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Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: February 7, 2024

/s/ Hootan Baigmohammadi  
HOOTAN BAIGMOHAMMADI  
Assistant Federal Defender  
Attorneys for Mr. Wilson

Date: February 7, 2024

/s/ Kyle Knapp  
Kyle Knapp  
Attorney for Mr. Cramer

Date: February 7, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ James R. Conolly  
James R. Conolly  
Assistant United States Attorney  
Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: February 07, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE